

**In the United States District Court  
for the Eastern District of Pennsylvania**

Richard C. Ackourey, Jr.,  
d/b/a Graphic Styles/Styles  
International LLC  
775 Second Street Pike, Suite 3R,  
Southampton, Pennsylvania 18966

**Plaintiff,**

**v.**

Mevana Fashions (aka Mevana Custom  
Shop, formerly Mevana Fashions,  
Inc.) and  
Ken Lakhiani  
1061 Smith Manor Boulevard  
West Orange, New Jersey 07052

**Defendants.**

**Civil Action No.**

**COMPLAINT FOR  
COPYRIGHT INFRINGEMENT**

**Civil Action**

**COMPLAINT FOR COPYRIGHT INFRINGEMENT**

Plaintiff Richard C. Ackourey, Jr., ("Ackourey") doing business as Graphic Styles/Styles International, LLC by and through his counsel, on personal knowledge as to his own actions and on information and belief as to the actions, capabilities and motivation of others, hereby alleges as follows:

**NATURE OF THE CASE**

1. Richard C. Ackourey, Jr., d/b/a Graphic Styles/Styles International LLC, brings this action to recover damages, expenses, and attorney fees arising from the willful infringement by Defendants, of Plaintiffs' registered copyrights on valuable artistic drawings and graphic representations of men's and women's fashion clothing styles, and to obtain injunctive relief against Defendants

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*Attorney at Law*  
One Hundred Ten Hyde Park ◊ Doylestown, Pennsylvania 18902  
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*Attorney at Law*

to cease and desist their infringement and to prevent them from any further unlawful copying and infringement of Plaintiffs' copyrights.

2. In violation of the Copyright Act, 17 U.S.C. § 501, *et seq.*, Defendants reproduced and displayed on their company website, at least 22 separate drawings of men's and women's fashion clothing styles copied directly from copyrighted stylebooks, without any authorization or permission from plaintiff -the owner of all right, title, and interest in all copyrights covering the drawings and stylebooks- despite express copyright restrictions and prohibitions against infringement and unauthorized use prominently stated in the stylebooks.

#### **THE PARTIES**

3. Richard C. Ackourey, Jr., is an individual residing in Southampton, Pennsylvania, and is the sole member of Graphic Styles/Styles International LLC. Mr. Ackourey owns all title, right, interest, ownership, and subsidiary and intellectual property rights in all the federally registered copyrights covering the drawings and graphic representations of men's and women's fashion clothing styles that Defendants copied, displayed, and transmitted on Defendants' website, Mevana.com.

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4. Graphic Styles/Styles International, LLC ("Graphic Styles") is a limited liability corporation with its principal place of business located at 775 Second Street Pike, Suite 3R, Southampton, Pennsylvania 18966. Graphic Styles develops, produces, sells, and distributes stylebooks containing copyrighted drawings and graphic representations of men's and women's fashion clothing styles and licenses the use of copyrighted drawings and graphic representations of men's and women's fashion clothing styles for promotional purposes such as websites, brochures, catalogs, placards and other advertising media.
5. Defendant Mevana Fashions (Mevana), is a business located at 1061 Smith Manor Boulevard, west Orange, New Jersey 07052. Mevana is engaged in the business of selling custom tailored retail apparel for men and women, online at its website Mevana.com, and through fittings made on its business premises, and at Fashion Shows it hosts throughout Philadelphia, throughout Pennsylvania and the United States.
6. Defendant Ken Lakhiani (Mr. Lakhiani), is the owner of Mevana, and does business as, operates, or otherwise controls Mevana. Mr. Lakhiani had the right and ability to direct or control the wrongful conduct and copyright infringement ("infringing activities") alleged in this

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Complaint, did in fact direct and control Defendants' infringing activities, and derived financial benefit from that wrongful conduct and copyright infringement.

#### **JURISDICTION**

7. This court has subject matter jurisdiction over Plaintiffs' claims for unauthorized use and copyright infringement pursuant to 17 U.S.C. § 501.

#### **VENUE**

8. Venue lies in this court under 28 U.S.C. §§ 1391 and 1400 (a).

#### **FACTS COMMON TO ALL CLAIMS - THE COPYRIGHTED STYLEBOOKS**

9. From about the 1950's until 2000, Graphic Fashions Inc., also known as Graphic Fashions International ("Graphic Fashions"), created, prepared, and published clothing stylebooks annually or semi-annually for use by tailors and manufacturers in the custom clothing industry ("preexisting material").
10. Each stylebook published by Graphic Fashions contained 160 to 260 artistic drawings and graphic representations of men's and women's fashion clothing styles: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements that Graphic Fashions had created.
11. Graphic Fashions was known throughout the custom clothing industry for the exceptional quality and value of the

artistic drawings and graphic representations in its stylebooks. Its images of fashion styles are unique in the industry and were not distributed or available from any other source except Graphic Fashions or Plaintiff, who was its exclusive licensee and copyright assignee.

12. Graphic Fashions registered its stylebooks as compilations under the Copyright Act, 17 U.S.C. § 103, which protects all the images in the stylebook from infringement.
13. Graphic Fashions displayed in its stylebooks the copyright notice, "© Copyright, Graphic Fashions Inc. Phila., PA", on the left-hand margin of each page containing one or more clothing style drawing.
14. On January 5, 2004, Graphic Fashions expressly granted Plaintiff in writing, the exclusive rights, for the life of the copyrights, to reproduce all copyrighted works owned by Graphic Fashions, and to create derivatives of, display, distribute, and transmit copies of, its copyrighted works. Graphic Fashions also assigned to Plaintiff all rights in derivative works created using the copyrighted works.
15. On July 3, 2007, Graphic Fashions expressly assigned to Plaintiff in writing "the entire title, right, interest, ownership and all subsidiary and intellectual property rights in and to" all copyrights registered to Graphic Fashions, "including but not limited to copyrights and the

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right to secure registered copyrights therein and to any resulting registrations in Assignee's name as claimant, and the right to secure renewals, and extensions of any such copyright or copyright registrations in the United States of America or foreign country as well as all choses [sic] in action relating to the [Graphic Fashion's copyrights], claims for damages, profits, and costs, both in equity and law, for any infringement of the [Graphic Fashion's copyrights]."

16. In 1999 Graphic Fashions prepared, published, and distributed the Graphic Styles Fashions International Stylebook, Styles for Seasons 1999 and 2000 ("99-00 Stylebook"), containing 220 images of drawings for men's and women's fashion clothing styles: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements, many of which were selected from the earlier preexisting material, i.e., stylebooks Graphic Fashions had published and registered as compilations under the Copyright Act. Graphic Fashions registered the 99-00 Stylebook as a compilation under copyright registration number TX 5-037-124. (Exhibit A). The copyright protections in the preexisting material are undisturbed and are herein independently enforced and damages independently pursued.

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17. The first page of the 99-00 Stylebook prominently carried a copyright notice.
18. The margin of the left-hand page in each stylebook also carried a copyright notice, "© Copyright, Graphic Fashions Inc. Phila. Litho in U.S.A.".
19. In 2005 Plaintiff prepared, published, and distributed the Graphic Styles International Stylebook, Best of Seasons through Spring and Summer 2005 ("2005 Stylebook"), containing 220 images of drawings for men's and women's fashion clothing styles: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and measurements, many of which were selected from the earlier preexisting material, i.e., stylebooks Graphic Fashions had published and registered as compilations under the Copyright Act. Plaintiff registered the 2005 Stylebook as a compilation under copyright registration number TX 6-956-665. The copyright protections in the preexisting material are undisturbed and are herein independently enforced and damages independently pursued.
20. In 2006 Plaintiff prepared, published, and distributed the Graphic Styles International Stylebook, Best of Seasons 2006 ("2006 Stylebook"), containing 367 images of drawings for men's and women's clothing designs: suits, jackets, trousers, vests, topcoats, tuxedos, pocket details, and

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measurements, selected from earlier stylebooks Graphic Fashions had published and registered as compilations under the Copyright Act. Plaintiff registered the 2006 Stylebook as a compilation under copyright registration number TX 6-956-762. The copyright protections in the preexisting material are undisturbed and are herein independently enforced and damages independently pursued.

21. The first page of both the 2005 Stylebook and 2006 Stylebook prominently displayed the statement that:

The images found in the Styles International Stylebook may not be reproduced in any form or by any means - graphic, electronic, or mechanical, including photo copying or information storage and retrieval systems - without the expressed written consent and permission of the copyright holder.

22. The first page of the 2006 Stylebook also has a message from Plaintiff:

I encourage you to use this book to enhance your business, however, please do it legally . . . . Any unlawful use or violation of the copyright laws for these illustrations will be prosecuted to the fullest extent of the law.

23. The margin of the left-hand page in each stylebook also carried a copyright notice, "© Copyright, Graphic Fashions Inc. Phila., PA".

#### **DEFENDANTS' INFRINGEMENT**

24. On or about June 7, 1989, Defendants pre-ordered for purchase the 99-00 Stylebook from Graphic Fashions' office in Pennsylvania, paying by cash.



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25. Beginning in approximately June of 2009 and continuing to approximately the date of filing this Complaint,, Defendants displayed on the Mevana website, Mevana.com, approximately 22 images showing men's and women's fashion styles that were copied from the 99-00 Stylebook, and/or other of Plaintiff's Stylebooks.
26. Defendants did not attribute the artistic drawings as belonging to Plaintiff, but passed off the artistic drawings as original to Defendants.
27. Defendants' specific purpose in creating and transmitting the infringing web pages of Mevana.com was to use Plaintiffs' copyrighted drawings to attract and secure purchasers for the specific men's and women's fashion clothing styles shown in the images. Defendants' use of the copyrighted drawings to solicit sales and promote the business and reputation of Defendants was a use of the copyrighted works that neither Plaintiff nor Graphic Fashions had permitted Defendants to make.
28. Defendant Mr. Lakhiani knew that the drawings taken from Plaintiff's copyrighted stylebook on behalf of himself and defendant Mevana, were protected by copyright, that he could not lawfully copy them without express permission from the copyright owner, and that the Defendants had never obtained authorization from the owner of the images, to

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use, copy, display, and transmit the images that Defendant Mr. Lakhiani had copied and displayed on Mevana.com.

**COUNT ONE**  
**COPYRIGHT INFRINGEMENT -17 D.S.C. § 501, ET SEQ.**

29. Plaintiff incorporates the prior paragraphs by reference.
30. Plaintiff is the sole owner by recorded assignment of all registered copyrights covering stylebooks prepared, published, and distributed by Graphic Fashions, Inc., and all of the copyrighted images and visual representations displayed in those stylebooks.
31. Plaintiff is the sole owner of the registered copyrights covering the preexisting materials, the 99-00 Stylebook, and all of the copyrighted images and visual representations displayed in that stylebook.
32. Defendants' copying of approximately 22 images showing drawings of men's and women's fashion clothing styles from Plaintiff's copyrighted stylebook, and their display on Mevana.com, infringed each of the compilation copyrights that protect one or more of the 22 images, and the copyright protections in the preexisting material including the following: A 440204, TX 1 714 805, TX 3 053 310, A 387716, TX 2-611-019, A 591921, TX 5-037-124, TX 2 902 726, TX 731-329, TX 5-253-538, TX 4-621-545, A 451646, TX 821-050, TX 6-956-655, TX 2 353 266, TX 2 150 566, TX 1-269-

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970, TX 3 229 071, TX 1 838 271, TX 4-831-173, TX 2 509 479, A 900783, TX 1-378-891, TX 539-997, TX 3 446-818, TX 2 240 703.

33. Defendants acted with willful blindness to and in reckless disregard of Plaintiffs' registered copyrights, including the several copyright notices accompanying the images, and the copyright notices displayed at the beginning of the stylebook.
34. Defendants' unabashed theft of Plaintiffs' copyrighted images; their purposeful display, transmission, and distribution of the copyrighted images on Mevana.com, and their purchasing new and complete stylebooks directly from Plaintiff that included prominent copyright warnings, further show the willfulness of Defendants' copyright infringement.
35. As a result of their wrongful conduct, Defendants are liable to Plaintiff for copyright infringement under 17 U.S.C. § 501.
36. Plaintiff is entitled to recover, under 17 U.S.C. § 504(b), actual damages for its established fees for individual illustrations of up to One Thousand, Eight Hundred and Fifty Dollars (\$1,850.00) and yearly renewal fees of up to Six Hundred Dollars (\$600.00) for copying and website

publishing, and any of Defendants' profits that are attributable to Defendants' infringement.

37. In the alternative, Plaintiffs claim statutory damages under 17 U.S.C. §504(c) for Defendants' unauthorized use and copyright infringement of Plaintiffs' registered copyrighted works.

38. Defendants' infringement has been willful within the meaning of the Copyright Act, so the Court's award of actual or statutory damages should be enhanced in accordance with 17 U.S.C. § 504(c)(2).

39. Plaintiff is also entitled to recover its attorney fees and expenses incurred in suit, including its costs of investigation under 17 U.S.C. §505 and other equitable doctrines.

RELIEF REQUESTED

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

- A. That the Court enter judgment against Defendants that:
  - i. Defendants have willfully infringed Plaintiff's federally registered copyrights under 17 U.S.C. § 501.
  - ii. Defendants have otherwise injured the business reputation and business of Plaintiff by their acts and conduct set forth in this Complaint.

- B. Defendants shall pay Plaintiff's general, special, actual, and statutory damages, and disgorge profits attributable to Defendants' infringement, under 17 U.S.C. § 504(b), or in the alternative, enhanced statutory damages under 17 U.S.C. § 504(c)(2), for Defendants' willful infringement of Plaintiff's copyrights.
- C. Defendants shall pay Plaintiff for his costs incurred in prosecuting this action, Plaintiffs costs of investigating Defendants' willful infringement, and his reasonable attorney fees.
- D. Defendants shall cease and desist immediately from all use, copying, reproducing, displaying or transmitting in any form, including electronically, any and all of Plaintiffs copyrighted works, drawings, and images.
- E. Plaintiff claims damages for the infringement of the 2005 Stylebook as a compilation, the 2006 stylebook as a compilation and independently for the copyright protections in the preexisting material.
- F. The Court shall grant Plaintiff such other and additional relief as is just and proper.

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**JURY DEMAND**

PAINTIFFF hereby demands trial by jury on all issues triable to a jury.

DATED: June 25, 2012

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By: \_\_\_\_\_

Michael J. Brooks, Esquire  
Attorney for Plaintiffs  
Supreme Court I.D. No. 74630

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## Additional Certificate (17 U.S.C. 706)

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

## FORM TX

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

TX 5-037-124



EFFECTIVE DATE OF REGISTRATION

9 7 99  
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

## 1 TITLE OF THIS WORK ▼

*FASHIONS INTERNATIONAL - SEASONS 1999-2000*

## PREVIOUS OR ALTERNATIVE TITLES ▼

*FASHIONS INTERNATIONAL*

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

## 2 a NAME OF AUTHOR ▼

*GRAPHIC FASHIONS, INC.*

## DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

OR Domiciled in ▼

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

*TEXT AND DRAWING*

## b NAME OF AUTHOR ▼

## DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

OR Domiciled in ▼

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

## c NAME OF AUTHOR ▼

## DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

OR Domiciled in ▼

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

## 3 YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

*1999*

Year

## DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Month *MAY* Day *15* Year *1999*

Nation *U.S.A.*

## 4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

*GRAPHIC FASHIONS, INC.  
426 VERNON ROAD P.O. BOX 353  
JENKINTOWN, PA 19046*

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

AUG 05 1999

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

AUG 05 1999

REMITTANCE NUMBER AND DATE

RECEIVED SEP 7 1999

MORE ON BACK ▶

- Complete all applicable spaces (numbers 5-11) on the reverse side of this page.
- See detailed instructions.
- Sign the form at line 10.

DO NOT WRITE HERE

Page 1 of 2 pages

## NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.



EXAMINED BY <u>                    </u>	FORM TX
CHECKED BY <u>                    </u>	
<input type="checkbox"/> CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> DEPOSIT ACCOUNT FUNDS USED	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- ☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
- ☐ This is the first published edition of a work previously registered in unpublished form.
- ☐ This is the first application submitted by this author as copyright claimant.
- ☐ This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

5

**DERIVATIVE WORK OR COMPILATION** Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

- a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates: ▼

6

- b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

See instructions  
before completing  
this space.**MANUFACTURERS AND LOCATIONS** If this is a published work consisting preponderantly of nondramatic literary material in English, the law may require that the copies be manufactured in the United States or Canada for full protection. If so, the names of the manufacturers who performed certain processes, and the places where these processes were performed must be given. See instructions for details.

Names of Manufacturers ▼

Places of Manufacture ▼

VALLEY PRESS

BALA CYNWYD, PA

OXFORD BOOKBINDING

PHILA, PA

7

**REPRODUCTION FOR USE OF BLIND OR PHYSICALLY HANDICAPPED INDIVIDUALS** A signature on this form at space 10, and a check in one of the boxes here in space 8, constitutes a non-exclusive grant of permission to the Library of Congress to reproduce and distribute solely for the blind and physically handicapped and under the conditions and limitations prescribed by the regulations of the Copyright Office: (1) copies of the work identified in space 1 of this application in Braille (or similar tactile symbols); or (2) phonorecords embodying a fixation of a reading of that work; or (3) both.a ☐ Copies and Phonorecordsb ☐ Copies Onlyc ☐ Phonorecords Only

See instructions.

8

**DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

9

**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

GRAPHIC FASHIONS, INC.

100 VERNON ROAD

JENKINTOWN, PA 19046

Area Code &amp; Telephone Number ▼

215 881 2260

Be sure to  
give your  
daytime phone  
number**CERTIFICATION\*** I, the undersigned, hereby certify that I am the

Check one ▼

- ☐ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)
- ☐ authorized agent of

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▼

10

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3.

JOHN GARNER

date: JULY 30, 1999



Handwritten signature (X) ▼

JOHN GARNER

**MAIL CERTIFICATE TO**

Certificate will be mailed in window envelope

Name ▼	GRAPHIC FASHIONS, INC.
Number/Street/Apartment Number ▼	D.O. BOX 383
City/State/ZIP ▼	JENKINTOWN, PA 19046

- Have you:
- Completed all necessary spaces?
  - Signed your application in space 10?
  - Enclosed check or money order for fee payable to Register of Copyrights?
  - Enclosed your deposit material with the application and fee?
- MAIL TO: Register of Copyrights, Library of Congress, Washington, D.C. 20559

11

\* 17 U.S.C. § 508(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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## Certificate of Recordation

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This is to certify that the attached document was recorded  
in the Copyright Office on the date and in the place shown below.

This certificate is issued under the seal of the  
United States Copyright Office.

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DATE OF RECORDATION

8Jul10

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3587

238

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VOLUME

DOC. NO.

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*Margbeth Peters*

Register of Copyrights and  
Associate Librarian for Copyright Services



Co:  
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OT:

ite at



## Document Cover Sheet

UNITED STATES COPYRIGHT OFFICE

## For Recordation of Documents

Volume 3587 Document 238Volume \_\_\_\_\_ Document JUL 08 2010Date of recordation AM 10 08 2010  
(ASSIGNED BY THE COPYRIGHT OFFICE)

Funds received \_\_\_\_\_

DO NOT WRITE ABOVE THIS LINE - SEE INSTRUCTIONS ON REVERSE

To the Register of Copyrights: Please record the accompanying original document or properly certified copy thereof.

- 1 First party name given in the document Graphic Fashions, Inc.  
(IMPORTANT: Please read instruction for this and other spaces.)
- 2 First title given in the document Fashions International, fall and winter, 1990-1991
- 3 Total number of titles in the document 24
- 4 Amount of fee calculated \$ 675.00
- 5 Fees enclosed ☒ Check ☐ Money order  
☐ Fee authorized to be charged to Copyright Office deposit account

Deposit account number \_\_\_\_\_

Deposit account name \_\_\_\_\_

- 6 Completeness of document ☒ Document is complete by its own terms ☐ Document is not complete. Record "as is."  
**IMPORTANT NOTE:** A request to record a document "as is" under 37 CFR §201.4(c)(2) is an assertion that: (a) the attachment is completely unavailable for recordation; (b) the attachment is not essential to the identification of the subject matter of the document; and (c) it would be impossible or wholly impracticable to have the parties to the document sign or initial a deletion of the reference to the attachment.

- 7 Certification of Photocopied Document Complete this certification if a photocopy of the original signed document is substituted for a document bearing the actual original signature.  
**NOTE:** This space may not be used for documents that require an official certification.

I declare under penalty of perjury that the accompanying document is a true and correct copy of the original document.

Signature Richard C. Ackoway, Jr. Date 7/2/2010

Duly authorized agent of \_\_\_\_\_

## 8 Return to:

Name Richard C. Ackoway, Jr.Number/street 19 Cypress Circle Apt./suite \_\_\_\_\_City Richboro State PA Zip 18954Phone number 215-808-8488 Fax number 215-364-4710Email Rick@thestylebook.com

SEND TO: Library of Congress, Copyright Office, Documents Recordation Section, 101 Independence Avenue SE, Washington, DC 20559-6000

INCLUDE ALL THESE TOGETHER: (1) Two copies of this form; (2) payment from a deposit account or by check/money order payable to Register of Copyrights; and (3) your document.



### COPYRIGHT ASSIGNMENT

AGREEMENT made by and between [Graphic Fashions, Inc. and Virginia Garner, wife of the late John Garner], having an address of 615 Laurel Lake Drive A219, Columbus, NC 28722 (hereinafter called "Assignor") and Richard C. Ackourey, Jr., having a principal place of business at 2423 Susquehanna Road, Suites 3 & 4, Roslyn, PA 19001 (hereinafter called "Assignee").

WHEREAS, the late John Garner had prepared, created, or developed certain materials or works, (some of which are covered by the copyright Registrations, shown in Exhibit A hereto) which were exclusively licensed by him and his company, Graphic Fashions, Inc. to Assignee by letter dated January 5, 2003, attached as Exhibit B (hereinafter the "Work");

WHEREAS, Assignor desires to transfer the entire ownership of all intellectual property, including but not limited to the copyright in the Work, to Assignee;

IT IS THEREFORE agreed between Assignor and Assignee as follows:

1. Assignor hereby grants, transfers, assigns, and conveys to Assignee, its successors and assigns, the entire title, right, interest, ownership and all subsidiary and intellectual property rights in and to the Work, including but not limited to copyrights and the right to secure copyright registrations therein and to any resulting registrations in Assignee's name as claimant, and the right to secure renewals, and extensions of any such copyright or copyright registrations in the United States of America or foreign country as well as all choses in action relating to said Work, claims for damages, profits and costs, both in equity and law, for any infringement of said Work.

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2. Whether the copyright in the Work shall be preserved and maintained or registered in the United States of America or any foreign country shall be the sole discretion of Assignee.

3. Assignor agrees that, as a result of this Copyright Assignment, it will retain no rights in and to the intellectual property in the Work, including: trademark and trade dress protection and copyright in the Work; the right to reproduce, prepare derivative works based upon the copyright in the Work, or to distribute by sale, by rental, lease or by other transfer of ownership; or to display the Work.

4. Assignor hereby warrants and represents the following to Assignee:

(a) To the best of Assignor's knowledge and belief, Assignor is the exclusive and sole owner of the copyright in the Work, free of all liens, claims and encumbrances; and Assignor has the absolute right to assign the copyright in the Work without seeking the approval of any third party and without payment to any third party. There are no actions at law or in equity pending or threatened by or against Assignor by reason of its or another party's use of the Work or challenging Assignor's copyright in the Work.

(b) To the best of Assignor's knowledge and belief, the Work is original with Assignor.

(c) To the best of assignor's knowledge and belief, Assignor is not restricted or prevented from entering into this Copyright Assignment

5. Assignor agrees to take all action and cooperate as is necessary to protect the copyrightability of the Work and future agrees to execute any documents



that might be necessary to perfect Assignee's ownership of copyright and other intellectual property including any copyright registrations in the Work.

6. All terms of this Agreement are applicable to any portion or part of the Work, as well as the Work in its entirety.

7. This Agreement constitutes the entire agreement between the parties hereto and supersedes any prior oral or written agreement or understanding between the parties as to ownership of intellectual property rights, including trademark and trade press protection and copyright in the Work, and no modification shall be valid unless signed by both parties.

8. This Agreement shall be interpreted under the laws of the state of Pennsylvania.

IN WITNESS WHEREOF and intending to be legally bound hereby, the parties have hereunder set their hands.

Executed: 7-3-07

X Virginia St. Lorne  
By: [Assignor name]

Ruth P. Heinemann  
WITNESS

Executed: 11/16/05

Richard C. Ackourey, Jr.  
By: [Assignee name]

Name: Richard C. Ackourey, Jr.

Title: President

Marta Ackourey  
WITNESS



TX 1-269-970 20Dec83; spring-summer 84. DCR 1983; PUB 30Nov83;

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Title: Fashions international  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.  
Claimant: \* acGraphic Fashions, Inc.  
TX 1-378-891 14Jun84; fall 84-winter 85. DCR 1984; PUB 30May84;

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Title: Fashions International  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.  
Claimant: \* acGraphic Fashions, Inc.  
TX 1-501-023 22Jan85; spring-summer 85. DCR 1985; PUB 15Jan85;

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Title: Fashions international  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.  
Claimant: \* acGraphic Fashions, Inc.  
TX 1-662-171 25Sep85; fall 85-winter 86. DCR 1985; PUB 15Jun85;

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Title: Fashions International  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.  
Claimant: \* acGraphic Fashions, Inc.  
TX 1-714-805 13Dec85; spring-summer 86. DCR 1985; PUB 1Dec85;

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Title: Fashions international  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Claimant: \* acGraphic Fashions, Inc.  
TX 1-838-271 11Jun86; fall 86-winter 87. DCR 1986; PUB 1Jun86;

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Title: Fashions international  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.  
Claimant: \* acGraphic Fashions, Inc.  
TX 2-150-566 24Jul87; fall 87-winter 88. (C.O. corres.) DCR 1987; PUB 16Jun87;

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Title: Fashions international  
Additional Information: .  
Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

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Copyright

Search Records

Results

Registered Works Database (Claimant Search)

Search For: GRAPHIC FASHIONS, INC

Items 1 - 4 of 4

For a list of commonly used abbreviations that appear in the catalog record, click here.

[Conduct Another Search](#)

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1. Registration Number: TX-2-902-726

Title: Fashion International, fall and winter, 1990-1991.

Claimant: acGraphic Fashions, Inc.

Created: 1990

Published: 1Jun90

Registered: 15Aug90

Special Codes: 1/B

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2. Registration Number: TX-3-229-071

Title: Fashions International : spring and summer 1992.

Claimant: acGraphic Fashions, Inc.

Created: 1991

Published: 2Jan92

Registered: 9Jan92

Special Codes: 1/B

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3. Registration Number: TX-5-037-124

Title: Fashions International : styles for seasons 1999 and 2000.

Description: 1 v.

Claimant: acGraphic Fashions, Inc.

Created: 1999

Published: 15May99

Registered: 7Sep99

Title on © Application: Fashions International: seasons 1999-2000.

Special Codes: 1/B

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4. Registration Number: TX-5-253-538

Title: Distinctive fashions 1998.

Description: 26 p.

Claimant: on text &amp; artwork; acGraphic Fashions, Inc.

Created: 1997

Published: 15Aug97

Registered: 24Jul00

Title on © Application: Distinctive fashions.

Special Codes: 1/B/D

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Washington, D.C. 20559 6000  
(202) 707-3000

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Copyright	Search Records	Results
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Serials Database (Claimant Search)

Search For: GRAPHIC FASHIONS, INC

Items 1 - 19 of 19

For a list of commonly used abbreviations that appear in the catalog record, click here.

[Conduct Another Search](#)

Title: Fashions International

Additional Information: : [fash on folio].

Note: Frequency unknown. Description based on: Fall-winter 1978-79.

Copyright Information: Appl. au.: acGraphic Fashions, Inc., employer for hire.

Claimant: \* Graphic Fashions, Inc. TX54-929. 14Jun78; fall-winter 78-79. DCR 1978; PUB 8Jun78;

Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 Issue.

Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.

Claimant: \* acGraphic Fashions, Inc.

TX 539-997 14Jul80; fall 80-winter 81. (C.O. corres.) DCR 1980; PUB 1May80;

Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 Issue.

Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.

Claimant: \* acGraphic Fashions, Inc.

TX 731-329 30Jul81; fall 81-winter 82. DCR 1981; PUB 1May81;

TX 821-050 16Dec81; spring-summer 82. DCR 1981; PUB 5Nov81;

Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.

Claimant: \* acGraphic Fashions, Inc.

TX 1-067-384 14Jan83; fall-winter 82-83. (C. O. corres.) DCR 1982; PUB 1Jun82;

Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Copyright Information: Appl. au.: Graphic Fashions, Inc., employer for hire.

Claimant: \* acGraphic Fashions, Inc.

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Claimant: \* acGraphic Fashions, Inc.

TX 2-240-703 19Jan88; spring-summer 88. DCR 1988; PUB 2Jan88;

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Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 2-353-266 13Jul88; fall 88-winter 89. DCR 1988; PUB 1Jul88;

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Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 2-509-479 13Feb89; spring-summer 89. DCR 1989; PUB 2Jan89;

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Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 2-611-019 30Jun89; fall 89-winter 90. DCR 1989; PUB 1Jun89;

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Title: Fashions International

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 3-053-310 12Mar91; spring-summer 91. DCR 1991; PUB 1Jan91;

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Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 3-446-818 9Dec92; spring-summer 93. DCR 1992; PUB 6Dec92;

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Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 4-621-545 25Aug97; fall 97-winter 98. DCR 1997; PUB 15Apr97;

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Title: Fashions international

Additional Information: .

Note: Frequency unknown. Description based on: Fall 1980-winter 1981 issue.

Claimant: \* acGraphic Fashions, Inc.

TX 4-831-173 17Sep98; fall 98-winter 99. DCR 1998; PUB 15Jun98;

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(202) 707-3000

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# GRAPHIC FASHIONS, Inc.

P. O. BOX 383 • JENKINTOWN, PA 19046-0383

Mr. Richard C. Ackourey, Jr.  
Ackourey Clothiers, Inc.  
2423 Susquehanna Road, Suite #4  
Roslyn, PA 19001

RE: Permission to Use Copyrighted Works of John Garner and/or Graphic Fashions, Inc.

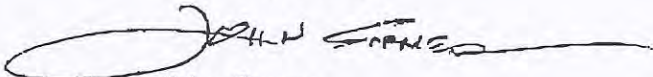
Dear Rick:

On behalf of myself and of Graphic Fashions, Inc., I, John Garner, grant you, Richard C. Ackourey, Jr., exclusive permission to do the following with respect to all of the copyrighted works owned by me and/or by Graphic Fashions, Inc. to which you have access (hereinafter "Copyrighted Works"):

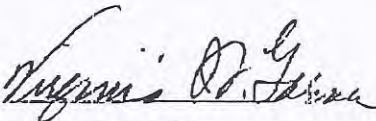
1. Reproduce the Copyrighted Works;
2. Prepare derivative works (hereinafter "Derivative Works") based upon the Copyrighted Works [1];
3. Distribute copies of the Copyrighted Works of Derivative Works to the public by sale or other transfer of ownership, or by rental, lease or lending;
4. Display the Copyrighted Works or Derivative Works publicly; and
5. Transmit the Copyrighted Works or Derivative Works.

The permission referred to in this letter shall last for the life of the copyright in said Copyrighted Works.

Sincerely yours,

  
John Garner

Witness:



Date:

1-5-12

[1] I hereby assign to Richard C. Ackourey, Jr. all copyright rights in and to all Derivative Works created by Richard C. Ackourey, Jr. based upon the Copyrighted Works.